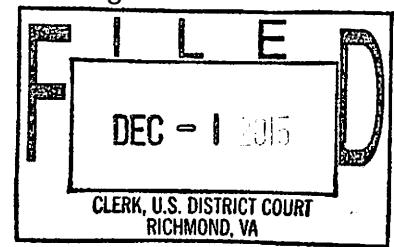


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA



Richmond Division

UNITED STATES OF AMERICA)	Criminal No. 3:15cr <u>191</u>
)	
)	18 U.S.C. § 1951(a)
v.)	Conspiracy to Affect Commerce by
)	Robbery
)	(Count One)
ROBERT C. DOYLE,)	
)	18 U.S.C. §§ 922(g)(1) and 2
)	Possession of Firearm by Felon
RONALD B. CHANEY III,)	(Count Two)
)	
and)	26 U.S.C. § 5861(d)
)	Possession of Unregistered Firearms
CHARLES D. HALDERMAN,)	(Count Three)
)	
<i>Defendants.</i>)	

INDICTMENT

DECEMBER 2015 TERM - At Richmond, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Conspiracy to Affect Commerce by Robbery)

From in or about September 2015, and continuing through on or about November 8, 2015, in the Eastern District of Virginia and within the jurisdiction of this Court, ROBERT C. DOYLE, RONALD B. CHANEY III, and CHARLES D. HALDERMAN did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with each other, and with others known and unknown to the Grand Jury, to commit the offense of robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a).

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to steal, and take by force, certain precious metals and diamonds, and the proceeds of the sale of these items from A.M., a person engaged in interstate commerce.

MEANS AND METHODS

To accomplish the object of the conspiracy, the coconspirators employed the following means and methods:

1. On or about October 9, 2015, defendant DOYLE used the internet to search and find a listing for a silver and coin dealer in the Richmond, Virginia area, with the intent to plan a robbery of this dealer. When asked who could assist in the robbery, DOYLE told a cooperating witness that Ron [CHANAY] and Danny [HALDERMAN] were good to go.
2. On or about October 13, 2015, DOYLE directed that a telephone call be made to the silver and coin dealer to obtain information and to “set him up” for the robbery.
3. On or about October 14, 2015, DOYLE talked to a cooperating witness about getting a “dirty pistol” for use in the robbery.
4. On or about October 14, 2015, DOYLE and a cooperating witness placed a telephone call to a person that DOYLE believed to be the silver and coin dealer. After the call, DOYLE stated: “I knew it, I knew it. He’s talking about having loose diamonds too. I’m telling you man, that’s probably a million dollar lick bro. Literally.”

5. On or about October 25, 2015, DOYLE and CHANEY traveled to the business location of the person they believed to be the silver and coin dealer. CHANEY waited outside while DOYLE met with the silver and coin dealer, discussed prices, purchased some silver coins, and ordered approximately \$100,000 worth of precious metals and jewels to be purchased at a later date.
6. On or about November 2, 2015, HALDERMAN confirmed that he had discussed the robbery plans with DOYLE.
7. On or about November 3, 2015, HALERMAN agreed to participate in the robbery and said, "I'm firm."

(In violation of Title 18, United States Code, Section 1951(a)).

COUNT TWO

(Possession of a Firearm by a Convicted Felon)

On or about November 8, 2015, in the Eastern District of Virginia and within the jurisdiction of this Court, defendants, ROBERT C. DOYLE and RONALD B. CHANEY III, each having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess certain firearms and ammunition, to wit:

- a. **Colt Industries, M-16A, 15.56 mm assault rifle, serial number 4864576;**
- b. **Silencer, Model QDSS-NT4, serial number T5944;**
- c. **HK, Model Mk23, .45 caliber pistol, serial number 23-0185; with silencer;**
- d. **Industrial use cast booster explosive with detonation cord and explosive blasting caps;**
- e. **.45 caliber ammunition.**

in and affecting interstate and foreign commerce, and did aid and abet each other in doing so.

(In violation of Title 18, United States Code, Sections 922(g)(1) and 2).

COUNT THREE
(Possession of Unregistered Firearms)

On or about November 8, 2015, in the Eastern District of Virginia and within the jurisdiction of this Court, defendants, ROBERT C. DOYLE and RONALD B. CHANEY III, aided and abetted by each other, did knowingly receive and possess certain firearms, to wit:

- a. **Colt Industries, M-16A, 15.56 mm assault rifle, serial number 4864576;**
- b. **Silencer, Model QDSS-NT4, serial number T5944;**
- c. **HK, Model Mk23, .45 caliber pistol, serial number 23-0185; with silencer;**
- d. **Industrial use cast booster explosive with detonation cord and explosive blasting caps.**

not registered to either of them in the National Firearms Registration and Transfer Record.

(In violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871 and Title 18, United States Code, Section 2).

FORFEITURE ALLEGATION

Pursuant to Rule 32.2 Fed. R. Crim. P., the defendants are hereby notified that upon conviction of the offense alleged in Count One of this Indictment, the defendants shall forfeit any property, real or personal, which constitutes or is derived from any proceeds traceable to the violation; and any firearm or ammunition involved in or used in the violation.

The defendants are further notified that upon conviction of the offense charged in Count Two of this Indictment, the defendants shall forfeit any firearm or ammunition involved in or used in the violation.

The defendants are further notified that upon conviction of the offense charged in Count Three of this Indictment, the defendants shall forfeit any firearm involved in the violation.

(In accordance with Title 18, United States Code, Section 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461; Title 18, United States Code, Section 924(d), as incorporated by Title 28, United States Code, Section 2461; and Title 26, United States Code, Section 5872.)

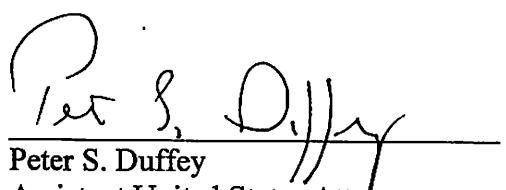
A TRUE BILL

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

FOR PERSON

DANA J. BOENTE
UNITED STATES ATTORNEY

By:


Peter S. Duffey
Assistant United States Attorney